

EXHIBIT 1 TO ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: BAYOU STEEL BD HOLDINGS, LLC, <i>et al.</i> , ¹ Debtors.	Chapter 7 Case No. 19-12153 (KBO) (Jointly Administered)
GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of BAYOU STEEL BD HOLDINGS, L.L.C., <i>et al.</i> , Plaintiff, vs. CANADIAN NATIONAL RAILWAY COMPANY, Defendant.	 Adv. Pro. No. 21-50205 (KBO)

**SECOND STIPULATION FOR FURTHER EXTENSION OF TIME FOR DEFENDANT
TO ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Bayou Steel BD Holdings, L.L.C., *et al.*, (the “**Plaintiff**”), for the estates of the above-captioned debtors (the “**Debtors**”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “**Bankruptcy Code**”), by and through his undersigned counsel and defendant Canadian National Railway Company (the “Defendant,” and together with Plaintiff, the “Parties”), enter into this *Second Stipulation for Extension of Time for the Defendant to Answer, Move or Otherwise Respond to the Complaint* (the “**Stipulation**”) and hereby stipulate and agree as follows:

1. Except as provided in paragraph 2 below, the Parties agree and stipulate that the time within which the Defendant may answer, move, or otherwise plead in response to the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

Complaint [D.I. 1] in the above-captioned adversary proceeding is hereby extended to and including May 21, 2021.

2. The Defendant agrees that process and service of process are proper and sufficient in this case and waives any defenses under Fed. R. Civ. P. 12(b) (4) and (5), made applicable in this adversary proceeding by Fed. R. Bankr. P. 7012(b).

3. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.

Dated: April 21, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)
Andrew W. Caine (CA Bar No. 110345)
Peter J. Keane (DE Bar No. 5503)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
acaine@pszjlaw.com
pkeane@pszjlaw.com

*Counsel to Plaintiff, George L. Miller, Chapter 7
Trustee for the Estates of Bayou Steel BD Holdings
L.L.C., et al.*

and

FLETCHER & SIPPEL LLC

/s/ Michael J. Barron, Jr.

Michael J. Barron, Jr., Esq.
29 North Wacker Dr, Suite 800
Chicago, IL 60606-3208
(312) 252-1500 (Main)
(312) 252-2400 (Fax)
Email: MBarron@fletcher-sippel.com

Counsel to Defendant